

Tom Jones & Associates

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BARBARA CA 931

2005



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Federal Communications Commission
Office of the Communications Secretary
Attn. CGB room 3-B431
445 12th street, SW
Washington DC 20554



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TJA ADVERTISING
& Public Relations

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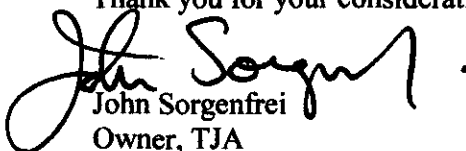
TJA@TJAAdvertising.com

Our company, TJA Advertising, is requesting an exemption from the closed captioning requirement for our client, 3 Way Chevrolet, for the following reasons:

1. This would pose an undue burden on our client, 3 Way Chevrolet, and our agency. Our show is a local car sales program in rural Bakersfield California that offers no news-related value to the audience. It features used vehicles for sale every other week.
2. The show's content mirrors the audio and the text is clearly written on the screen. This format, we feel, makes closed captioning unnecessary. With each car the following written text is on screen (the voice over just restates the text on screen):
 - a. Price of car
 - b. Color
 - c. ID number
 - d. Certified used
 - e. Features of the vehicle
 - f. Address, phone, websites
 - g. Brand logos
 - h. All legal sales disclaimers
3. The entire production costs for this piece ranges from \$1,200 to \$1,500 per show. The closed captioning for the show would cost more than 70% of the cost of the total production. This would make the show no longer financially viable to produce and would cause an undue burden.
4. The show is also time sensitive. The closed captioning production would delay the airdate of the show by several days. This would cause the show's content to no longer be viable to the consumer and would make the show's content dated (with many of the cars already sold by the time of the airdate) and would cause a further burden.

We feel that the most compelling reason for this exemption is the show's content, which is already fully exposed on the screen. Anyone with a hearing disability would be able to visibly receive the entire content of the show in its present form without the need for closed captioning. This, we feel, puts our show in compliance with the nature of the law.

Thank you for your consideration,


John Sorgenfrei
Owner, TJA